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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,)	No. CR 05-0801 JW
)	
12 Plaintiff,)	STIPULATION TO CONTINUE
13 v.)	HEARING AND EXCLUDE TIME;
)	[PROPOSED] ORDER
14 JACOB STORY and)	
MICHAEL CRAWFORD,)	
)	
15 Defendants.)	

16 **STIPULATION**

17 Defendants and the government, through their respective counsel, hereby stipulate that,
18 subject to the court's approval, the hearing in the above-captioned matter, presently scheduled for
19 Monday, September 18, 2006, at 1:30 p.m., be continued to Monday, November 6, 2006, at 1:30
20 p.m. The continuance is requested to allow time for the defendants to conduct additional
21 investigation, including forensic review of computer evidence on behalf of Mr. Crawford.
22 Additionally, the parties are engaged in settlement negotiations and are exchanging settlement
23 proposals, and both defense counsel require time to discuss settlement with their clients.

24 The parties further agree that time should be excluded under the Speedy Trial Act until
25 the next hearing of this matter because the defendants require time for investigation and
26 preparation, and the ends of justice outweigh the defendants' and the public's need for a speedy

1 trial.

2 Dated: 9/15/06

3 /s/
LARA S. VINNARD
4 Assistant Federal Public Defender
Attorney for Michael Crawford

5 Dated: 9/15/06

6 /s/
ROBERT CAREY
7 Attorney for Jacob Story

8 Dated: 9/15/06

9 /s/
CARLOS SINGH
Assistant United States Attorney

10 **ORDER**

11 All parties have requested a continuance of the hearing set for September 18, 2006, on
12 grounds that the defendants require additional time to conduct investigation and discuss
13 settlement with their attorneys, and the parties require time to engage in further settlement
14 negotiations.

15 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the hearing date
16 presently set for September 18, 2006, be continued to November 6, 2006, at ^{1:30 p.m.}~~9:00 a.m.~~

17 Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time
18 from September 18, 2006, to November 6, 2006, shall be excluded from the period of time
19 within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq.
20

21 Dated: 9/18/06

22 
JAMES WARE
23 United States District Judge
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